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Pro Hac Vice Application Forthcoming

Attorney(s) for Plaintiff Keith Brown

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEITH BROWN, an individual,

Plaintiff,

v.

ARTEC GLOBAL MEDIA, INC., a Nevada
Corporation; BART AND ASSOCIATES, LLC,
a Colorado limited liability company; STONE
DOUGLASS, an individual; NOVA CAPITAL
ADVISORS, LLC, a California limited liability
company; PETERSON SULLIVAN LLP, a
Washington limited liability partnership;
WALTER WELSH, an individual; CALEB
WICKMAN, an individual; and MASON
YAMASHIRO, an individual,

Defendants.

CASE NO.: 2:17-cv-01883-JAD-PAL

**MOTION TO ENLARGE TIME
FOR NON-RESIDENT COUNSEL
TO FILE VERIFIED PETITION
AND MOTION FOR
PERMISSION TO PRACTICE IN
THIS CASE ONLY**

& ORDER

ECF No. 62

Plaintiff KEITH BROWN (“Plaintiff”), by and through his undersigned counsel,
and pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 6(b)(1), hereby requests
an enlargement of time for non-resident counsel to file a Verified Petition and Motion for
Permission to Practice in This Case Only (“*Pro Hac* Application”).

MEMORANDUM OF POINTS AND AUTHORITIES

FRCP 6(b)(1) provides, in pertinent part, that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires.” On July 10, 2017, this Court ordered all non-resident counsel to file *Pro Hac* Applications by August 24, 2017. [ECF No. 50]. This request is therefore being made before the original time expires and, as discussed below, good cause exists for granting Plaintiff’s request.

Non-Resident counsel for Plaintiff, John Ryan Gustafson, Esq., of the law firm Gustafson Nicolai pc, has agreed in principle to associate with the Nevada law firm Holley Driggs Walch Fine Wray Puzey & Thompson as local counsel in this action. This case was recently transferred to this Court from the United States District Court for the Southern District of California. Attorney Gustafson has been counsel of record for Plaintiff in the case since its inception and is awaiting the forwarding of his required certificate of good standing from the State Bar of California. Plaintiff therefore believes good cause exists to grant this short extension to allow Plaintiff’s non-resident counsel to file his *Pro Hac* Application.

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1 Plaintiff therefore respectfully requests, pursuant to FRCP 6(b)(1) an extension of
2 twenty (20) days, from August 24, 2017, to September 13, 2017, to allow to Plaintiff's
3 non-resident counsel to submit his *Pro Hac* Application.

4 DATED this 24th day of August, 2017.

5 **HOLLEY DRIGGS WALCH**
6 **FINE WRAY PUZEY & THOMPSON**

7 /s/ Sean E. Story

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19 *Pro Hac Vice Application Forthcoming*

20 *Attorneys for Plaintiff*

21 **ORDER**

22 Good cause appearing, IT IS HEREBY ORDERED that the Motion to Enlarge
23 Time [ECF No. 62] is **GRANTED**; plaintiff has until **September 13, 2017**, to file
24 its non-resident counsel's *pro hac vice* application.

25 
26 U.S. District Court Jennifer Dorsey
27 8-25-17
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